

SATTERLEE STEPHENS BURKE & BURKE LLP

230 PARK AVENUE

NEW YORK, NY 10169-0079

(212) 818-9200

METROPARK
33 WOOD AVENUE SOUTH
ISELIN, NJ 08830
(732) 603-4966

FAX (212) 818-9606, 9607
www.ssbb.com

E-Mail: jdoty@ssbb.com
Direct Dial: (212) 404-8718

February 15, 2011

VIA ELECTRONIC FILING AND FIRST CLASS MAIL

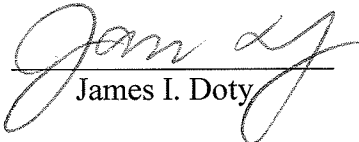
The Honorable Susan D. Wigenton
United States District Judge
United States District Court for the District of New Jersey
Martin Luther King Courthouse
50 Walnut Street, Room 2060
Newark, NJ 07101

Re: Russell-Brown v. The University of Florida Board
of Trustees, , et al., No. 10-cv-4017-SDW-MCA

Dear Judge Wigenton:

On behalf of The University of Oxford ("Oxford") and Oxford University Development (North America), Inc., we write in response to the letter of Plaintiff's counsel, dated February 11, 2011, in which he renews his request for jurisdictional discovery. The crux of Mr. Hinds' argument is that discovery is needed to explore his client's fantastical assertion of a conspiracy between Oxford and the University of Florida Defendants, but binding case law forecloses this argument; as the Third Circuit recently explained, New Jersey does not recognize the conspiracy theory of jurisdiction. See Lasala v. Marfin Popular Bank Pub. Co., 2011 WL 49315, at *4 (3d Cir. Jan. 7, 2011). Accordingly, the asserted conspiracy, even if proven, would not suffice to establish jurisdiction over our clients. See id. As a result, the purported emails referenced by Mr. Hinds simply have no bearing on the jurisdictional analysis.

Respectfully submitted,


James I. Doty